

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS (Worcester)**

**Anthony Campbell,**

**Plaintiff,**

**vs.**

**Isolation Technologies, Inc.**

**Larry D'Amato**

**Defendants**

**Case No. 04-40236 FDS**

**INITIAL RULE 26(a)(1) DISCLOSURES**  
**OF DEFENDANT, ISOLATION TECHNOLOGIES, INC.**

Defendant, Isolation Technologies, Inc., in compliance with Fed.R.Civ.P. 26(a)(1), hereby makes the following initial disclosures:

**(A) Witnesses Likely to Have Discoverable Information:** In addition to the named parties in this action, and except for those witnesses who may be used for impeachment purposes and those who are not presently known, Isolation Technologies, Inc. (hereinafter, "Isolation"), states that the following individuals are likely to have discoverable information which it may use to support its defenses.

1.

Peter Zekos  
President  
Excel Staffing, Inc.  
22 Water Street  
Westborough, MA 01581  
(508) 898-3300

Mr. Zekos is expected to provide testimony concerning his conversation with the plaintiff on the subject of an offer of employment made by Isolation.

2.

Paul Satterfield  
Branch Manager  
Excel Staffing, Inc.  
Excel Staffing, Inc.  
22 Water Street  
Westborough, MA 01581  
(508) 898-3300

Mr. Satterfield is expected to provide testimony concerning his conversation with the plaintiff on the subject of an offer of employment made by Isolation.

3.

Michael Rigloli  
Vice President  
Isolation Technologies, Inc.  
4 Business Way  
Hopedale, MA 01747  
(508) 478-0111

Mr. Rigoli is involved in the overall management of Isolation and may have discoverable information concerning its practices involved in hiring temporary employees.

4.

Lori A. Arias  
Human Resources  
Isolation Technologies, Inc.  
4 Business Way  
Hopedale, MA  
(508) 478-0111

Ms. Arias is involved in the human resources activity at Isolation and may have discoverable information concerning its practices involved in hiring temporary employees, as well as Isolation's attempts to hire Mr. Campbell.

5.

Michael Cassassanto  
Manufacturing  
Isolation Technologies, Inc.  
4 Business Way  
Hopedale, MA  
(508) 478-0111

Mr. Cassassanto was the General Manager at Isolation during the relevant period, and may have discoverable information regarding Isolation's desire and attempts to hire the plaintiff.

6.

Michael Proctor  
Group Leader  
Isolation Technologies, Inc.  
4 Business Way  
Hopedale, MA  
(508) 478-0111

Mr. Proctor was a Group Leader at Isolation during the relevant period, and may have discoverable information concerning Mr. Campbell's performance while assigned to work at Isolation.

7.

Keith Audette

Last known address:

42 Ash Street, #3

Fall River, MA 02724

Mr. Audette was a Group Leader at Isolation during the relevant period, and may have discoverable information concerning Mr. Campbell's performance while assigned to work at Isolation.

**(B) Documents**

(i) The following documents within Isolation's possession are privileged, pursuant to Fed.R.Civ.P. 26b)(5), as trial preparation materials:

Statements of Keith Audette, Michael Proctor, Michael Cassassanto and Lori Arias, which statements describe the plaintiff's responsibilities and desirability as an employee of Isolation.

(ii) The following document is attached hereto, as Exhibit A:

Affidavit of Peter Zekos filed in matter of Campbell v Isolation Technologies, et al, Massachusetts Commission Against Discrimination, Docket No. 022302493.

(iii) Copies of the following documents are within Isolation's possession and available for inspection by the plaintiff at a mutually agreeable time at the offices of the undersigned attorney for Isolation.

Copies of pleadings, submissions and discovery responses filed in connection with the Massachusetts Commission Against Discrimination in the matter of Campbell v Isolation Technologies, et al, Massachusetts Commission Against Discrimination, Docket No. 022302493.

Copies of pleadings, submissions and discovery responses filed in connection with the Massachusetts Commission Against Discrimination in the matter of Campbell v Reed-Rico, Docket No. 99-SEM-0130.

**(C) Damages**

Isolation is defendant in this matter and, as of this time, claims no damages.

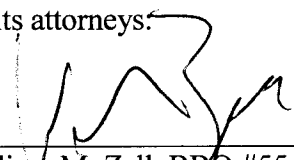
**(D) Insurance**

An insurance agreement is not applicable to this matter.

Isolation reserves the right to supplement these disclosures to the extent necessary under Fed.R.Civ.P. 26(e)(1). An omission of any document, person or entity in these disclosures should not be considered a waiver of Isolation's intention to utilize such document or call such witness to the extent that opposing party is made aware of this intention with sufficient time to conduct necessary discovery regarding that person or entity.

Isolation Technologies, Inc.


By its attorneys:

  
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William M. Zall, BBO #554135  
CUNNINGHAM, MACHANIC,  
CETLIN, JOHNSON, & HARNEY LLP  
220 North Main Street  
Natick, MA 01760  
TEL:(508) 651-7524  
FAX:(508) 653-0119

Dated: 4-15-05

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon each party appearing pro se by mail on April 15, 2005.

  
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William M. Zall

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